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*[Additional Counsel on signature page]*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ELLEN PACE,

Plaintiff,

vs.

OMNI FAMILY HEALTH,

Defendant.

Case No. 1:24-cv-01277-JLT-CDB

**JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING MOTION TO  
SUBSTITUTE AND MOTION TO REMAND**

WHEREAS, presently pending before the Court are two motions: Plaintiffs' Motion to Remand (ECF 11 on Docket No. 1:2024-cv-01459) and Defendant's Motion to Substitute (ECF 16 in 1:24-cv-01277);

WHEREAS, on February 13, 2025, the Court granted the Parties' joint administrative motion and proposed order amending the briefing schedule for those motions (ECF 23);

WHEREAS, the Parties filed simultaneous oppositions on February 28, 2025, in accordance with the modified briefing schedule;

WHEREAS, replies to the motions are due on March 21, 2025, and a hearing for the two motions is set for April 29, 2025;

WHEREAS, the Parties agree that Defendant's Motion to Substitute should be decided first by this Court;

WHEREAS, the Parties agree the Court may, in its discretion, hold Plaintiffs' Motion to Remand in abeyance pending determination of the Motion to Substitute;

WHEREAS, the Parties agree that once the Motion to Substitute is decided, the Court may then rule on the Motion to Remand, such that if the Motion to Substitute is granted the Motion for Remand shall be denied, and if the Motion to Substitute is denied, the Motion for Remand shall be granted and the removed actions consolidated with *Pace* shall be remanded subject to any appeals;

WHEREAS, the Defendant requests, and Plaintiffs do not oppose, modifying the existing briefing schedule to provide an additional five days for the Parties to file replies in support of their respective motions.

NOW, THEREFORE, the Parties, by and through their undersigned counsel, jointly stipulate and agree to a modified briefing and hearing schedule, subject to the Court's approval, as follows:

Event	Prior Deadline	New Deadline
Plaintiffs' Reply In Support of Remand	March 21, 2025	March 26, 2025
Defendant's Reply In Support of Motion to Substitute	March 21, 2025	March 26, 2025
Hearing only on Motion to Substitute	April 29, 2025	April 29, 2025

1 DATED: March 19, 2025

2 By: /s/ Adam E. Polk

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18 By: /s/ Tambry L. Bradford (as authorized on  
March 19, 2025)

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**ORDER**

The above stipulation is **APPROVED**. The parties are also informed that once the Court has an opportunity to examine the reply filings, it may take the matter under submission on the papers.

IT IS SO ORDERED.

Dated: **March 20, 2025**

  
UNITED STATES DISTRICT JUDGE